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Attorney for Defendant  
CARRIE MARIE SULAK

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. CR-S-04-0218 MCE
	)	
Plaintiff,	)	
	)	STIPULATION AND <del>{PROPOSED}</del> ORDER
v.	)	
	)	
CARRIE MARIE SULAK, et al.	)	Date: November 22, 2005
	)	Time: 8:30 a.m.
Defendants.	)	Judge: Hon. Morrison C. England
	)	
_____	)	

It is hereby stipulated and agreed to between the United States of America through Phil Ferrari, Assistant U.S. Attorney and defendant, CARRIE MARIE SULAK, by and through her counsel, Dennis S. Waks, Supervising Assistant Federal Defender, that the status conference of November 1, 2005 be vacated and a change of plea be set for November 22, 2005 at 8:30 a.m.

This continuance is being requested because defense counsel requires additional time to review discovery, continue our investigation, and to interview our client and other witnesses. Furthermore, the parties are negotiating a plea agreement and need time to reduce it to writing and provide it to the Court. Defense counsel

1 needs time to discuss the plea with the prosecutor and with the  
2 defendant.

3 Speedy trial time is to be excluded from the date of this order  
4 through the date of the change of plea hearing set for November 22,  
5 2005, pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 based  
6 upon continuity of counsel and defense preparation.

7 Dated: October 28, 2005

8 Respectfully submitted,

9 QUIN DENVIR  
Federal Defender

10 /s/ Dennis S. Waks

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12 DENNIS S. WAKS  
13 Supervising Assistant Federal  
14 Defender  
Attorney for Defendant  
CARRIE MARIE SULAK

15 Dated: October 28, 2005

16 MCGREGOR W. SCOTT  
17 United States Attorney


18 /s/ Dennis S. Waks for

19 \_\_\_\_\_  
20 PHIL FERRARI  
Assistant U.S. Attorney

21 O R D E R

22 IT IS SO ORDERED.

23 Dated: November 3, 2005

24   
25 \_\_\_\_\_  
26 MORRISON C. ENGLAND, JR.  
27 UNITED STATES DISTRICT JUDGE  
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